September 29, 2022

VIA ECF

The Honorable Laura Taylor Swain Chief United States District Judge United States District Court Southern District of New York 500 Pearl Street New York, New York 10007

MEMO ENDORSED

Re: United States v. Gregoire Tournant, 22-cr-276 (LTS)

Dear Chief Judge Swain:

The Government and Mr. Tournant respectfully submit this letter to jointly request that the Court extend the deadline for the parties to submit their joint letter regarding a proposed motion schedule for the first stage of motion practice from September 29, 2022 to October 4, 2022. (*See* Sept. 15, 2022 Text-Only Order.) The parties are continuing to meet and confer to reach an agreement on the schedule and request additional time to complete their negotiations.

We thank the Court for its attention to this matter.

Respectfully submitted,

DAMIAN WILLIAMS United States Attorney

s/

Nicholas Folly Margaret Graham Allison Nichols

Assistant United States Attorneys

The foregoing extension request is granted. DE 25 is resolved. SO ORDERED. /s/ Laura Taylor Swain, Chief U.S. Dist. Judge September 30, 2022

cc: All counsel of record (via ECF)

LEVINE LEE LLP

/s/ Seth L. Levine

Seth L. Levine 1500 Broadway, Suite 2501 New York, New York 10036 slevine@levinelee.com

BUCKLEY LLP

/s/ Daniel R. Alonso

Daniel R. Alonso 1133 Avenue of the Americas, Suite 3100 New York, New York 10036 dalonso@buckleyfirm.com

Attorneys for Defendant Gregoire Tournant